



April 2, 2026

Limited Environmental Review and Finding of No Significant Impact

**City of Toledo – Lucas County
Arlington Sewer Replacement Project
Loan number: CS390915-0155**

The attached Limited Environmental Review (LER) is for a wastewater collection project in Toledo which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Arlington Sewer Replacement Project

Applicant: City of Toledo
One Government Center 22nd Floor
Toledo, Ohio 43602

Loan Number: CS390915-0155

Project Summary

The City of Toledo has applied for funding from the Ohio Water Pollution Control Loan Fund (WPCLF) for the Arlington Sewer Replacement Project. The project is intended to replace a collapsed section of wastewater collection pipe to improve the existing infrastructure. The estimated loan amount for the project is \$7,997,463 and, as an emergency project, construction began July 2025 and is scheduled to be completed by August 2026.

History & Existing Conditions

The City of Toledo, in Lucas County (see Figure 1), owns a combined sewer system, portions of which date back to the 1860s, that is operated by its Division of Sewer and Drainage Services. Nearly 200,000 linear feet (LF) of sewers 48-inch in diameter and larger have been inspected since 1994. In October 2024, there was evidence of a sink hole along Arlington Avenue, above the 48-inch sewer. Inspections found that this area of sewer, which was constructed in 1927, contained a large amount of debris inside the pipe and was missing some of its clay tiles. Based on this information, a project was designed for bidding to clean out, repair, and line the existing 48-inch sewer.

However, in March 2025, the sewer surcharged near Francis and Arlington avenues. City crews discovered that the top of the 48-inch sewer in this location had collapsed, a sinkhole developed above the pipe, and the sewer was impassable. Temporary bypass pumping was put into place to eliminate discharge of effluent until a permanent solution could be constructed.

Project Description

The proposed project will permanently bypass the aged and failing sewer lines by installing 1,129 LF of new 48-inch diameter sewer pipe via jack and bore, with the existing lines being abandoned and filled in place. The project will also install an effluent bypass pumping system along Francis Avenue

for the duration of the project to maintain wastewater flows. Construction will take place within the previously disturbed area of the road right-of-way that supports no environmental resources, with restoration activities afterwards. See Figure 2 for project location.

Implementation

The estimated loan amount for the project is \$7,997,463, all of which is expected to be funded through the WPCLF. Toledo qualifies for the standard long-term WPCLF below-market interest rate on 20-year loans, which in April is 3.2%. The standard rate is changed monthly to reflect bond rates and may be slightly different if the loan is awarded in a different month. Borrowing at 3.2% will save Toledo approximately \$1.3 million over the life of the loan compared to the current market rate of 4.45%.

Debt for the project will be repaid from monthly sewer fees without rate increases. Under the current sewer rates and based on usage of 4,000 gallons of water per month, the average residential sewer bill is \$56.75 per month, or \$681 per year, as compared to the state average of \$528.

Public Participation

Ohio EPA is unaware of any controversy about or opposition to this project. The residents were first notified when the sink hole was discovered in October 2024. Local news has been engaged starting with the first sink hole, and subsequently with the second sink hole and sewer surcharging events. There have been several public meetings facilitated by the City of Toledo to provide updates for the project and to communicate construction-related impacts.

The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to the City of Toledo to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for an LER; namely, it is an action within an existing public wastewater collection system, which involves the functional replacement of and improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation.

Sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species will not be affected or are not present in the project area.

Will have no effect on high-value environmental resources. The project will take place within the previously disturbed area of the road right-of-way. No high-value environmental resources are present.

Is cost effective. There is no alternative to the necessary bypass replacement of a failing, collapsed sewer.

Is not a controversial action. User rates will not be increased as a result of this project, adverse impacts to environmental resources are unlikely to occur, and Ohio EPA is unaware of any public opposition to the project.

Does not create a new or relocate an existing discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters. The project involves the functional replacement of and improvements to existing equipment and not increases to pollutant discharges.

Will not provide capacity to serve a population substantially greater than the existing population. The project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

Based upon Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to environmental features. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. The project will allow the city to address an emergency situation with its sanitary sewers by replacing failing and aged sewer lines, reducing risks related to exposure to untreated wastewater. Also, by using WPCLF low-interest financing, Toledo has minimized the project cost.

Contact Information

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Figure 1. General project area



Figure 2. Project area